REMARKS

Claims 1-13 and 5-10 were rejected under 35 USC 103 as being unpatentable over Brownell, US Publication No.2002/0169980 in view of Crichton et al US Patent 6,104,716. Applicants respectfully traverse.

In the previous response applicants expressed the view that <u>as long as the Brownell et al publication has not issued as a patent</u>, its effective date is the date of publication; and that date <u>*succeeds*</u> the filing date of this application. The Examiner's "Response to Arguments" states that applicants' arguments are moot in view of the new grounds for rejection. In respectful rebuttal, applicants submit that the Examiner is in error because in as much as the new grounds for rejection relies on the Brownell et al publication, it cannot possibly overcome applicants' argument and, therefore, if applicants' view is correct, applicants' argument is not moot but, rather, *is dispositive in favor of patentability* of the instant claims.

In addition to the above, it is respectfully submitted that the claims are not obvious in view of the cited references for the reasons presented below.

The Brownell publication describes an arrangement where a data channel is established between an external host on one side of a firewall and an internal host on the other side of the firewall. The user connects **to** the firewall, and is authenticated **by** the firewall. Each process of the external host that wishes to interact with the internal host is assigned a firewall tunnel that is configured according to a policy that is prearranged for the authenticated user, thereby allowing the external host to interact with the internal host, via the firewall, as permitted.

First, amended claim 1 specifies a firewall that has an IP address. In contradistinction, the firewall of Brownell is not described to have an IP address. Second, according to amended claim 1, a connection request is received <u>by a first proxy</u>, and NOT by the firewall. In contradistinction, in the Brownell reference (a) there is no first proxy, and (b) the connection request from an outside-the-firewall host is received by the firewall itself. Third, according to amended claim 1, the message that is received is received by the first proxy that has an IP address <u>that is different from</u> the IP address of the firewall. In contradistinction, in the Brownell reference there is no notion of a separate IP address of a proxy (which is not surprising since there is no teaching or

suggestion of a separate proxy). Fourth, according to claim 1 a second proxy is authenticating the user AND that second proxy also establishes a data connection "through said firewall, through which said first proxy can forward requests of said client to said second proxy." In other words, a series connection is established that comprises a first proxy, the firewall, and a second proxy. The Brownell reference, in contradistinction, teaches that other hosts on the inside of the firewall participate in the authentication process, but there is no second proxy described that performs the authentication process, and there is no series connection as specified in amended claim 1. That is, those hosts do NOT establish any connection, do not establish a data connection to the first proxy, and certainly do not establish a connection through which the external host can forward requests for service (in addition to the already-accounted for request to authenticate). Therefore, the Examiner's *admission* that the Brownell reference does not teach the second proxy is indeed correct.

The Examiner points to the Crichton et al reference for the proposition that it teaches a second proxy authenticating the client, where the second proxy establishes a data connection with the first proxy, through the firewall, through which the first proxy can forward requests of the client to the second proxy. In support of this assertion the Examiner points to col. 2, lines 26-27, and lines 32-55, as well as to col. 5, lines 17-25, col. 4, lines 42-50, and col. 6, lines 40-47. Applicants respectfully traverse.

While it is true that the Crichton et al reference teaches a proxy on the inside side of the firewall, none of the cited passages teach that this proxy authenticates an outside user/client. Moreover, the Crichton et al reference teaches communication in an arrangement that comprises three proxies. The middle proxy, which in terms of the relationship with the inside-the-firewall proxy corresponds to the first proxy of amended claim 1, is shown to interoperate only with other proxies, and not with a user/client/host. It is respectfully submitted, therefore, that amended claim 1 has numerous limitations that are not found in the combination of the Brownell and Crichton et al references, thus making amended claim 1 not obvious.

Since claim 1 is not obvious in view of Brownell and Crichton et al combination of references, it is respectfully submitted that all claims that depend on claim 1 are also not obvious in view of these references.

A special note about claims 4 and 16 is in order, however.

These claims were rejected in the current Office Action in view of Brownell in combination with Crichton et al and Malcolm, US Patent 6,256, 631. Applicants respectfully traverse. The Examiner's assertion that applicants' previous arguments are moot in light of the new rejection (that of adding the Crichton et al reference) is believed inappropriate because applicants' argument was that the Malcolm reference **does not translate hyperlinks** as claims 4 and 16 specify, and the newly cited Crichton et al reference simply does not address this limitation in the subject claims. Indeed, even the Examiner is not asserting that Crichton et al teach the step of translating hyperlinks. It is respectfully submitted, therefore, that the Examiner owes some explanation -- other than mootness in light of the new grounds for rejection -- for maintaining the rejection of these claims because, based on applicants' un-rebutted argument, the claims are patentable.

Claims 11-13 were rejected under 35 USC 103 as being unpatentable over the Brownell reference in view of the Malcolm reference. The rejection of these claims is identical to the rejection of these claims in the previous Office action. Applicants addressed this rejection in the previously filed response, and demonstrated that the Malcolm teachings do not correspond to the claim limitations attributed by the Examiner. The Examiner has not rebutted applicants' arguments even though applicants' arguments are clearly not moot (since the rejection is unaltered).

Substantively, applicants respectfully reiterate that none of the claim 11 steps are taught or suggested by any of the references. The Examiner asserts that Brownell teaches parsing a resource "for hyperlinks to other recourses behind the firewall." In support of this assertion the Examiner points to paragraph 50, but that paragraph basically teaches that a web browser will display web pages. The notion of _processing_ a page – other than displaying it – is simply not present in this or any other paragraph. In particular, the notion of parsing an image to identify hyperlinks in certainly not present in Brownell et al. Moreover, even in connection with the "processing" of the web page in the course of conditioning it for display, such processing is merely execution of instructions (e.g. "display the following in blue") there is still no "rewriting" of any hyperlinks (or rewriting of anything, for that matter). In short, the Examiner's assertion as to the applicability of the Brownell reference is in error.

In light of this argument, the teachings of Malcolm are not relevant, but it should be pointed out that Malcolm does not (a) identify hyperlinks and (b) rewrite them. Rather, Malcolm identifies <u>non-hyperlink strings</u> of a certain format, and replaces them with hyperlinks. It is also noted that the paragraph which begins at col. 5, lines 22 starts with the phrase "once the hyperlink is located" but the text pertains to a determination of to what URL to generate in response to a particular identified (non-hyperlink) string – such as Hertz Corp. vs. Avis Inc. citation (see col. 5, line 17). It does not pertain to locating hyperlinks in a web page.

As for claim 13, which specifies that the rewritten hyperlinks "comprise security information" the Examiner points to Brownell paragraphs 49, 58, 60, and 65. Applicants respectfully disagree that these paragraphs show rewritten hyperlinks that comprise security information. Paragraph 49 merely describes the physical arrangement of elements. Paragraphs 58, 60 and 65 describe the existence of tunnels that permit secure communication because each tunnel is associated with a particular process of a user who was authenticated. It can be argued that the information of the tunnel comprises security information, but that is <u>not a hyperlink</u> that comprises security information.

In light of the above amendments and remarks, applicants respectfully submit that all of the Examiner's rejections have been overcome. Favorable consideration of the outstanding claims and allowance of same are respectfully solicited.

Respectfully,
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